

Barry Y. Freeman
Partner
Buckingham, Doolittle & Burroughs, LLC
1375 E. 9th Street, Suite 1700
Cleveland, OH 44114

d: 216.736.4223
f: 216.615.3023
c: 216.410.2844

bfreeman@bdblaw.com
bdblaw.com



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From: Chris Wido [<mailto:Chris.Wido@spitzlawfirm.com>]
Sent: Monday, April 03, 2017 10:36 AM
To: Barry Freeman
Cc: Gail Richards; Sally Kapcar; Brian Spitz; Andy Pulekins
Subject: RE: CL2-#460438-v2-Responses_to_5th_Set_of_RFPs - Discovery Dispute

Barry,

1. I am going to have Henrietta bring in her cell phone so we can try to pull any text that may exist.
2. We are not going to produce our communications with Henrietta. Feel free to brief it.
3. Please provide dates you will be available for Mr. Utreras' deposition in Chicago. For now, I am thinking 4/19 since we have to be there anyways for a CMC in the Illinois case. However, my local counsel says they court may move the date since Defendants have waived service, and their answer is not due until 4/24.

All the best,

Chris Wido

Chris P. Wido
THE SPITZ LAW FIRM, LLC
The Employee's Attorney.™
The WaterTower Plaza
25200 Chagrin Blvd, Suite 200
Beachwood Ohio, 44122
Phone: (216) 291-4744 x 130
Fax: (216) 291-5744

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